

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:14-cr-367 JAR (TCM)
)
ABSALOM CARLISLE,)
)
 Defendant.)

FIFTH MOTION TO TRAVEL

COMES NOW Defendant, Absalom Carlisle, by and through counsel, and hereby moves this Court for permission to travel with his parents from Sewanee, Tennessee to Palm Beach, Florida from April 5, 2016 through April 9, 2016. In support of this motion, Defendant states as follows:

1. Defendant's parents are scheduled to travel from Sewanee, Tennessee to Palm Beach Florida on April 5, 2016. They will return to Sewanee, Tennessee on April 9, 2016.
2. Among other things, Defendant's mother will celebrate her 66th birthday during the trip.
3. Defendant hopes to travel with his parents on this trip just prior to his April 14th Department of Homeland Security Interview and April 21st surrender to the Bureau of Prisons.
4. If permitted to travel, Defendant and his parents will stay at an address previously provided to the Office of Pretrial Services.
5. If permitted to travel, Defendant will contact his pretrial services officer as directed.
6. Defendant incurred no violations while on bond in this case and has incurred none

since sentencing.

7. Defendant, through counsel, has discussed this matter with pretrial services officer Lauren Gilkeson. Ms. Gilkeson does not object to Defendant's request.

8. Defendant, through counsel, has attempted to discuss this matter with assistant United States attorney Reginald Harris. Mr. Harris, however, was unavailable for comment.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to travel with his parents from Sewanee, Tennessee to Palm Beach, Florida from April 5, 2016 through April 9, 2016.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Reginald Harris, assistant United States attorney.